

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Thomas Edward Crawford, as Personal Representative of the Estate of William Todd Crawford, Deceased,)	C/A No. 7:07-cv-00140-GRA
)	
Plaintiff,)	
)	
vs.)	
)	
Charter Pines Behavioral Health System, LLC, The Carolina Center for Behavioral Health, Universal Health Services, Inc., UHS of Delaware, Inc., and UHS of Greenville Inc.,)	Defendants' Voir Dire
)	
Defendants.)	
)	

Defendants The Carolina Center for Behavioral Health, Universal Health Services, Inc., UHS of Delaware, Inc., and UHS of Greenville, Inc., respectfully request that the following questions be asked of the jurors:

1. Have you or any member of your family ever filed a lawsuit concerning medical malpractice?
2. Have you or any member of your family felt that you received inadequate treatment by a physician, hospital or psychiatric hospital/facility?
3. Is there any member of the jury panel who harbors any ill feelings for doctors, nurses or the medical profession in general?
4. Have you or any member of your family used the services of attorney Patrick Knie or his office, which is located is in Spartanburg, S.C., or attorney Kenneth

Holland or his office, which is located is in Gaffney, S.C., or are you acquainted with Patrick Knie or Kenneth Holland in any way?

5. Have you or any member of your family been diagnosed with a psychiatric/mental disease or disorder? If yes, did you or your family member receive treatment for the disease or disorder? If the answer is yes to either question, please explain.

6. Have you or your family member ever received care or been treated at The Carolina Center for Behavioral Health, formerly known as Charter Pines Behavioral Health Services, in Greer, SC?

7. Have you or any member of your family ever been prescribed pain medication to control severe and/or chronic pain? If yes, please list all medications prescribed.

8. Have you or any member of your family ever been addicted to or abused a prescription drug? If yes, did they receive treatment? If yes to either question, please explain.

9. Have you or any member of your family ever been prescribed and/or used Fentanyl (sometimes known under the brand name Duragesic)? If yes, have you or any member of your family ever suffered any complications from the use of Fentanyl/Duragesic?

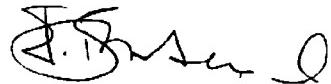
10. Is any member of the jury panel, by virtue of education, background, training or experience knowledgeable about the diagnosis and treatment of chronic pain and/or drug addiction?

11. Is any member of the jury panel, by virtue of education, background, training or experience knowledgeable about Fentanyl/Duragesic?

12. Is any member of the jury panel acquainted with any of the following individuals:

William Todd Crawford
Thomas Edward Crawford
Clarence E. Crawford
Gwendolyn Crawford
Renee Crawford
Lisa Price
Anthony Tridico, M.D.
David Brady, M.D.
Jeff Stevens, M.D.
Kevin M. Gray, M.D.
Marie Livingston
Rhonda Harvey, MHT
Beth Chandler-Fowler, RN
Sandra Terry-Tutt, RN
Gomez Romano, RN
Jennifer Cain, RN
John Vance, LISW
Wayne Binsted, LISW
Kay Griggs, RN
Rhonda Waddell, LPN
Barbara Powers, RN
Lori Lesli, RN
Danielle Nixon, RN
Jennifer Tabone, RN
Maggie Birmingham, RN
Jim Moran
Gerald M. Aronoff, M.D. (Charlotte, NC)
Erik D. Christensen, M.D. (Greenville, SC)
Layton McCurdy, M.D. (Charleston, SC)
John S. Markowitz, Pharm.D. (Mt. Pleasant, SC)
Thomas A. Duc, M.D. (Charleston, SC)
Ruth E. Winecker, Ph.D. (Pittsboro, NC)

HAYNSWORTH SINKLER BOYD, P.A.



By: _____
J. Ben Alexander Fed. ID No. 3252
Kenneth N. Shaw Fed. ID No. 10413
G. Dewey Oxner, Jr., Fed. ID No. 2950
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Greenville, SC 29602
(864) 240-3323
Attorneys for Defendants

Greenville, SC

Dated: 3/30/09